

## EXHIBIT F

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**From:** Joyce, Kimberly (Law) <kjoyce@law.nyc.gov>  
**Sent:** Wednesday, March 05, 2014 4:39 PM  
**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law); Larkin, Arthur (Law)  
**Subject:** RE: Nunez - E-Dsc

Hi Anna,

Below please find the list of custodians and emails left to be reviewed - as discussed on the call, the numbers will fluctuate depending on the order in which you prioritize the custodians.

Custodian	Parent emails (non-unique)
Agro-Doyle, Rose	16,445
Bailey, Emmanuel	130
Benitez, Ruben	11,912
Berliner, Erik	241
Blaskovic, Sabina	4,102
Cranston, Mark	4,098
Cripps, Robert	22,452
Cussen, Sean	38,541
Davis, Joandrea	24,179
Davis, Sr., Larry	15,445
Duffy, Edmond	6,940
Finkle, Florence	9,883
Finkleman, Lewis	19,473
Gooding, Janet	4,809
Hourihane, Michael	5,867
Jorgensen, Ronald	1,248
LaBruzzo, Carmine	12,044
McLaughlin, Gregory	18,198
Mirabal, Evelyn	23,315
Mulvey, Kathleen	9,633
Newton, Carlton	12,560
Schriro, Dora	8,407
Scott, Mark	22,354

-Kim

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**From:** Friedberg, Anna [mailto:Anna.Friedberg@ropesgray.com]  
**Sent:** Tuesday, March 04, 2014 3:01 PM  
**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)  
**Subject:** RE: Nunez - E-Dsc

Hi Kim,

We look forward to touching base tomorrow. One technical request, could the productions going forward always include the text and native paths in the dat. file? Outlined below are the items we were hoping to discuss on the call.

- *Production Priority*
  - As we discussed, please prioritize the production of the Venters emails within Berliner and other custodians followed by the production of emails for the Bailey, Mulvey/Duffy and finally Agro-Doyle custodians. We understand that some of the review and production for these custodians can occur simultaneously. As we discussed, we are hoping that you can make weekly productions for these custodians. We can discuss the feasibility of this on our next call.
- *Privilege Issues*
  - We also wanted to follow-up on the privilege issues we previously discussed. When can Plaintiffs expect a replacement production for the production we returned on February 7<sup>th</sup>? We also remain willing to sign a 502 D order and to discuss the City's proposed categories for the privilege log as we outlined in our January 23<sup>rd</sup> email.
- *Review Rates*
  - We understand you are onboarding additional team members early next week. We were hoping you could provide average review rates from the third and fourth days of the review. It is our experience that review rates from these days serve as a good barometer for review rates going forward.
- *Outstanding Production*
  - We were hoping you could identify which Group C custodians still have outstanding electronic discovery (with the exception of the already identified individuals). We were also hoping you could provide an estimate of the approximate number of documents outstanding for each of those individuals.

Thanks!

Anna

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**From:** Joyce, Kimberly (Law) [mailto:kjoyce@law.nyc.gov]

**Sent:** Friday, February 28, 2014 4:18 PM

**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Anna, I will be delivering the production this afternoon. Could someone please add me to the visitor list - I apologize for the short notice.

-Kim

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**From:** Friedberg, Anna [mailto:[Anna.Friedberg@ropesgray.com](mailto:Anna.Friedberg@ropesgray.com)]

**Sent:** Friday, February 28, 2014 8:32 AM

**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Kim,

Thanks again for the update. We had a couple of follow-up questions and items we wanted to confirm.

- *Follow-up Question*
  - Could you confirm whether the numbers below are unique emails for each individual? We assume so but please let us know if we are mistaken.
- *Production*
  - I did not receive a production of the Berliner/Venters emails yesterday. When can we expect that?
- *Production Priority*
  - As we discussed, please prioritize the production of the Venters emails within Berliner and other custodians followed by the production of emails for the Bailey, Mulvey/Duffy and finally Agro-Doyle custodians. We understand that some of the review and production for these custodians can occur simultaneously. As we discussed, we are hoping that you can make weekly productions for these custodians. We can discuss the feasibility of this on our next call.
- *Privilege Issues*
  - We also wanted to follow-up on the privilege issues we previously discussed. When can Plaintiffs expect a replacement production for the production we returned on February 7<sup>th</sup>? We also remain willing to sign a 502 D order and to discuss the City's proposed categories for the privilege log as we outlined in our January 23<sup>rd</sup> email.
- *Review Rates*
  - We understand you are onboarding additional team members early next week. We were hoping you could provide average review rates from the third and fourth days of the review. It is our experience that review rates from these days serve as a good barometer for review rates going forward.

I will circulate a dial-in for a call next Wednesday at 3:30 p.m. as we discussed.

Thanks,  
Anna

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]  
**Sent:** Tuesday, February 25, 2014 9:57 PM  
**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)  
**Subject:** RE: Nunez - E-Dsc

Hi Anna,

Below please find the below answers to your questions:

- We are preparing a production of Erik Berliner emails, approximately 420;
  - Production of Berliner emails to date: (60)
  - The number of Venters emails left to be produced from:
    - Berliner Custodian Emails: (206)

- o Other Custodian Emails: (1000)
- The number of emails left to be produced for:
  - o Emmanuel Bailey: (122)
  - o Rose Agro-Doyle: (16,445)
  - o Edmund Duffy: (6,453)
  - o Kathleen Mulvey: (6,467)

-Kim

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**From:** Friedberg, Anna [<mailto:Anna.Friedberg@ropesgray.com>]

**Sent:** Monday, February 24, 2014 9:15 AM

**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Kim,

I hope you had a nice weekend. We are hoping to schedule a call Wednesday afternoon to discuss the production items listed below. We are available at 3:30. Would that work for you guys?

As we discussed, we would like to prioritize the production of the DOC custodian emails with Homer Venters followed by the production of the 4 supervisors listed below. On the call on Wednesday we are hoping you could provide us with an update on the following:

- Production of Berliner emails to date
- The number of Venters emails left to be produced from:
  - o Berliner Custodian Emails
  - o Other Custodian Emails
- The number of emails left to be produced for:
  - o Emmanuel Bailey
  - o Rose Agro-Doyle
  - o Edmund Duffy
  - o Kathleen Mulvey

Thanks,  
Anna

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]

**Sent:** Thursday, February 20, 2014 2:06 PM

**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Anna,

We're available to speak tomorrow between 11 and 12. Please circulate a dial-in.

On another note, I received your voice message re: the transcripts. Sorry for not calling back - could we discuss that at the end of tomorrow's call?

Thanks.

-Kim

**Kimberly (Savino) Joyce**

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(212) 788-9776 (fax)

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**From:** Friedberg, Anna [<mailto:Anna.Friedberg@ropesgray.com>]

**Sent:** Thursday, February 20, 2014 11:12 AM

**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Kim,

We would like to set up a call to discuss the priority of production of electronic discovery in light of the Court's order yesterday. Are you available this afternoon any time between 3 and 5 or tomorrow between 11 and 12 or 2 and 4?

Thanks,

Anna

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]

**Sent:** Monday, February 10, 2014 3:46 PM

**To:** Busalacchi, Stephanie; Friedberg, Anna; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Great, thanks. Talk to you all then.

-Kim

**Kimberly (Savino) Joyce**

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**From:** Busalacchi, Stephanie [<mailto:Stephanie.Busalacchi@ropesgray.com>]  
**Sent:** Monday, February 10, 2014 3:41 PM  
**To:** Joyce, Kimberly (Law); Friedberg, Anna; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)  
**Subject:** RE: Nunez - E-Dsc

Thanks, Kim. Let's do 1pm on Wednesday. We can use the dial in below:

(888) 352- 5988  
Code: 2125969163

**Stephanie N. Busalacchi**

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]  
**Sent:** Monday, February 10, 2014 12:54 PM  
**To:** Busalacchi, Stephanie; Friedberg, Anna; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)  
**Subject:** RE: Nunez - E-Dsc

Hi Stephanie,

We are available between 12 and 2 on Wednesday. If that time range works for your side please circulate a dial-in #.

Thank you.

-Kim

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**From:** Busalacchi, Stephanie [<mailto:Stephanie.Busalacchi@ropesgray.com>]  
**Sent:** Monday, February 10, 2014 11:24 AM  
**To:** Friedberg, Anna; Joyce, Kimberly (Law); Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)  
**Subject:** RE: Nunez - E-Dsc

Hi Kim,

As Anna mentioned, we'd like to set up a call this week. Is your office available on Wednesday? Anytime between 11am-4pm would work for us.

Thanks,  
Stephanie

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**From:** Friedberg, Anna

**Sent:** Monday, February 10, 2014 9:00 AM

**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Kim,

I hope you had a nice weekend. We returned the CD production with the inadvertent production on Friday (see attached letter). Please re-produce a revised production as soon as possible.

Stephanie will be in touch to set up a call today. As I mentioned we would like to discuss when we can expect the production of the Berliner emails. We would also like to discuss prioritizing the production of Danielle Johnson's emails so we have all of these materials 30 days in advance of her deposition that has been noticed for April 1, 2013.

We understand you would also like to discuss a privilege protocol on this call and we are available to discuss.

Thanks,

Anna

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]

**Sent:** Wednesday, February 05, 2014 4:33 PM

**To:** Friedberg, Anna

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** Nunez - E-Dsc

Hi Anna,

Is your side available for a brief call either Friday before 2pm, or Monday? We'd like to discuss the claw back of the one email we've already discussed, and talk about setting up a similar process going forward.

Thanks.

-Kim

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